

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

A.E.S.E., a minor child, and EUSEBIO DANIEL SABILLON PAZ, her father,

Plaintiffs,

V.

UNITED STATES OF AMERICA and
MANAGEMENT & TRAINING
CORPORATION,

Defendants.

Case No. 2:21-cv-00569-RB/GBW

**STIPULATED MOTION FOR EXTENSION OF TIME TO FILE MOTION TO
COMPEL**

Plaintiffs respectfully submit this Stipulated Motion for Extension of Time to File Motion to Compel and state as follows:

1. On March 24, 2023, Plaintiffs served their First Set of Interrogatories, First Set of Requests for Production of Documents, and Request For Entry onto Land to Defendant Management & Training Corporation (the “Discovery Requests”).

2. Defendant Management & Training Corporation (“MTC”) requested, and Plaintiffs granted, an extension to May 12, 2023 to serve its responses to the Discovery Requests.

3. On May 12, 2023, MTC served its Objections, Answers, and Responses to the Discovery Requests, along with a production (the “Discovery Responses”).

4. Pursuant to Federal Rule of Civil Procedure 37 and District of New Mexico Local Rule 26.6, Plaintiffs have 21 days from receiving MTC's Discovery Responses to file a motion

to compel.

5. This Court previously granted Plaintiffs an extension of time to file a motion to compel through June 23, 2023. ECF No. 114.

6. After receiving MTC's Discovery Responses, Plaintiffs sent MTC a detailed deficiency letter on May 31, 2023, outlining numerous deficiencies in MTC's Discovery Responses and requesting that MTC supplement its Discovery Responses on or by June 14, 2023.

7. On June 1, 2023, MTC requested, and Plaintiffs granted, an extension to June 19, 2023 to serve its supplemental response to the Discovery Requests.

8. On June 16, 2023, MTC informed Plaintiffs that it is working diligently to prepare its supplemental response to the Discovery Requests, but that it is unsure when it will complete this response.

9. Plaintiffs are awaiting MTC's supplemental response to the Discovery Requests and need to review MTC's supplemental response before filing any motion to compel.

10. Given that the parties are currently engaged in good faith discussions around the scope and content of MTC's responses, objections, and answers to the Discovery Requests, Plaintiffs anticipate requiring an additional extension to file a motion to compel discovery, should one be required.

11. As MTC is not certain when it will be able to complete its supplemental response to the Discovery Requests, Plaintiff requests an extension of two weeks following Plaintiffs' receipt of MTC's supplemental responses to the Discovery Requests to file a motion to compel, should one be required.

12. Plaintiffs and MTC have stipulated to this motion, and MTC does not oppose granting an additional extension of a motion to compel, should one be required.

For these reasons, Plaintiffs respectfully move the Court to extend the time to file a Motion to Compel until two weeks following Plaintiffs' receipt of Defendant MTC's supplemental response to the Discovery Requests.

Respectfully submitted,

June 21, 2023

By: /s/ Marcela Johnson

Bradley Jenkins*

Zachary Manfredi*

Jessica Hanson*

Marcela Johnson*

Asylum Seeker Advocacy Project (ASAP)

228 Park Ave. S. #84810

New York, NY 10003

(646) 937-0368

bradley.jenkins@asylumadvocacy.org

zachary.manfredi@asylumadvocacy.org

jessica.hanson@asylumadvocacy.org

marcela.johnson@asylumadvocacy.org

Approved by

By: Approved via email on June 21, 2023

Christina Muscarella Gooch

P.O. Box 1945

Albuquerque, NM 87103

Telephone: (505) 883-3433

tmg@sutinfirm.com

*Attorney for Management & Training
Corporation*

Michael T. Mervis*

Tara M. Brailey*

Proskauer Rose LLP

11 Times Square

New York, NY 10036

(212) 969-3000

mmervis@proskauer.com

tbrailey@proskauer.com

** Appearing pursuant to D.N.M.LR-Civ.
83.3(a).*

Rebecca Sheff

Leon Howard

ACLU of New Mexico

P.O. Box 566

Albuquerque, NM 87103

(505) 266-5915

rsheff@aclu-nm.org

lhoward@aclu-nm.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on June 21, 2023, I filed the foregoing document electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means.

By: /s/ Marcela Johnson
Marcela Johnson